



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION IX

75 Hawthorne Street

San Francisco, CA 94105-3901

OCT 29 2010

Ted Schade
Air Pollution Control Officer
Great Basin Unified Air Pollution Control District
157 Short Street
Bishop, California 93514

Dear Mr. Schade:

Thank you for timely submission of the Great Basin Unified Air Pollution Control District's 2010 Ambient Air Monitoring Network Plan. We have reviewed the submitted document and have found that it meets the minimum requirements set forth under 40 CFR Part 58.10.

Enclosed, please find our comments on the plan. If you have any questions regarding this letter or the enclosed comments, please feel free to contact me at (415) 972-3851 or Michael Flagg at (415) 972-3372.

Sincerely,

A handwritten signature in black ink, appearing to read "Matthew Lakin".

Matthew Lakin, Manager
Air Quality Analysis Office
Air Division

Enclosure

cc: Christopher Lanane

Comments on 2010 Great Basin Network Plan

Please update next year's annual network plan to reflect the following comments:

- The monitoring objectives and purposes assigned to each monitoring site should be consistent with EPA definitions. 40 CFR 58 App. D 1.1.1 outlines the six general monitoring site types, which are commonly referred to as the monitoring objectives:
 - (a) Highest Concentration
 - (b) Population Oriented
 - (c) Source Impact
 - (d) Background
 - (e) Transport
 - (f) Visibility Impacts

Tables 2 and 3 should be updated and combined to clearly reflect the monitoring objectives and spatial scales for each site. Also, Table 3 should be updated to reflect the requirements in Table D-1 in 40 CFR 58 App. D, which outlines the appropriate relationship between the various monitoring purposes and spatial scales.

- The site reports in Appendix C do not contain any information pertaining to semi-annual flow audits. The specific dates for the last two semi-annual flow audits should be included in each applicable site report.
- The designation of each monitor (e.g. FRM, FEM, or Non-Regulatory) and the respective method code should be included in the site reports.
- The site reports from Keeler only contain information from a continuous PM_{2.5} FDMS TEOM and two PM₁₀ TEOMs. The site reports do not include information for the collocated filter based PM_{2.5} and PM₁₀ instruments.
- The site report from Mammoth Lakes does not include information from the filter based PM₁₀ instrument located at the site.
- Section 6.0 states that the district is responsible for monitoring in the Searles Valley nonattainment area, though the plan does not include information from this area and AQS indicates that the support agency is Mojave Desert AQMD. Clarification on this issue would be very helpful.